

REMARKS

The present response is intended to be fully responsive to the rejection raised in the Office action, and is believed to place the application in condition for allowance. Further, the Applicants do not acquiesce to any portion of the Office Action not particularly addressed. Favorable reconsideration and allowance of the application is respectfully requested.

In the Office action, the Office noted that claims 1 and 3-6 are pending and rejected. Applicants amend claims 1 and 3-6. Applicants have not introduced any new matter by way of the foregoing amendments.

In view of the above amendments and the following discussion, the Applicants submit that none of the claims now pending in the application are obvious under the provisions of 35 U.S.C. § 103. Thus, Applicants believe that all of these claims are now in condition for allowance.

OBJECTION

The Office objected to claims 5 and 6 for tagging the element with "(a)" instead of "(d)". The Applicants thank that Office and have amended claims 5 and 6 to remedy the informality.

REJECTION

The Office rejected claims 1 and 4 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. Patent No. 6,597,397 issued to Duncan et al. (hereon after "*Duncan*"). Moreover, the Office rejected claims 3, 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,642,956 issued to Safai et al. (hereon after "*Safai*") in view of U.S. Patent No. 6,674,464 issued to Mizutani et al. (hereon after "*Mizutani*"). The Applicants respectfully traverse the rejections.

A. Applicant's Response to the 35 U.S.C. § 102(e) Rejection of claims 1 and 4

The Office rejected claims 1 and 4 under 35 U.S.C. § 102(e) as being unpatentable over *Duncan*. The Applicants traverse the rejection.

As the Examiner is aware, "anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." *Lindemann Maschinen Fabrick GmbH v. American Hoist Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984) [emphasis added]. Applicant submits that the cited reference is devoid from disclosing at least one element recited in Applicant recited invention.

In the Office Action, the Office insinuated that *Duncan* discloses all the elements recited in claims 1 and 4. Applicants amend claims 1 and 4 to recite an integrated circuit "wherein the integrated circuit utilizes parameter-driven address generation and looping control. " Applicants submit that *Duncan* does not teach or recite an integrated circuit that utilizes parameter-driven address generation and looping control. Hence, the Applicants submit that amended claims 1 and 4 satisfy the requirements of 35 U.S.C. § 102(e) and are in condition for allowance.

B. Applicant's Response to the 35 U.S.C. § 103(a) Rejection of claims 3, 5 and 6

The Office rejected claims 3, 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over *Safai* in view of *Mizutani*. The Applicants traverse the rejection.

As the Examiner is aware, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claimed limitations. The teaching or suggestions to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaeck, 947 F. 2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Furthermore, as the Office is also aware, the courts have repeatedly stated that a prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. *W.L. Gore & Associates, Inc. V. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983).

Safai discloses a digital camera that includes a programmable processor that includes the "capability of economically configuring the digital camera as desired...

an on demand specialized imaging modes such as the capture mode and the cineview mode." *Safai*, at Abstract.

Mizutani, on the other hand, discloses an image apparatus that includes a CCD interface that "causes the image data from the image generating unit 10 to be written in the image memory 32 via memory controller 22 after decimation and gama correlation etc." *Mizutani*, at Abstract.

Accordingly, it is Applicant's opinion that *Safai* and *Mizutani*, alone and in combination, do not suggest or show a motivation for modifying the reference or to combine the reference teachings. In addition, it is Applicant's opinion that there is no evidence in any of the prior art that shows a "reasonable expectation of success" in combining the references. Thus, it is Applicant's belief that a prima facie case of obviousness has not been provided. Therefore, Applicants submit that claims 1 and 3-6 are not obvious in view of *Safai* and *Mizutani*, alone and in combination.

The Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1 and 3-6.

CONCLUSION

In view of the foregoing, the Applicants submit that none of the claims presently in the application are anticipated under 35 U.S.C. §102 or obvious under the provisions of 35 U.S.C. §103. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Office believes that any unresolved issues still exist or if, in the opinion of the Office, a telephone conference would expedite passing the present application to issue, the Office is invited to call the undersigned attorney directly at 972-917-4365 or the office of the undersigned attorney at 972-917-4363 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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